

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE SOUTHERN DISTRICT OF TEXAS  
HOUSTON DIVISION**

<b>In re:</b>	§	
	§	<b>Chapter 11</b>
	§	
<b>TALEN ENERGY SUPPLY, LLC, et al.,</b>	§	<b>Case No. 22-90054 (MI)</b>
	§	
	§	<b>(Jointly Administered)</b>
<b>Debtors.<sup>1</sup></b>	§	<b>(Re: Docket Nos. 29, 116, 558)</b>
	§	

**NOTICE OF FILING OF FURTHER REVISED PROPOSED FINAL ORDER  
(I) AUTHORIZING DEBTORS TO (A) CONTINUE PERFORMING UNDER  
PREPETITION HEDGING AGREEMENTS, (B) ENTER INTO AND PERFORM  
UNDER NEW POSTPETITION HEDGING AGREEMENTS, AND (C) GRANT  
RELATED LIENS AND SUPERPRIORITY CLAIMS AND AUTHORIZE POSTING  
OF MARGIN COLLATERAL AND POSTPETITION EXCHANGE COLLATERAL,  
(II) MODIFYING AUTOMATIC STAY, AND (III) GRANTING RELATED RELIEF**

**PLEASE TAKE NOTICE THAT**, on May 10, 2022, Talen Energy Supply, LLC and its debtor affiliates in the above-captioned chapter 11 cases, as debtors and debtors in possession (collectively, the **“Debtors”**), filed the *Emergency Motion of Debtors for Order (I) Authorizing Debtors to (A) Continue Performing Under Prepetition Hedging Agreements, (B) Enter Into and Perform Under New Postpetition Hedging Agreements, and (C) Grant Related Liens and Superpriority Claims and Authorize Posting of Margin Collateral and Postpetition Exchange Collateral, (II) Modifying Automatic Stay, and (III) Granting Related Relief* [Docket No. 29] (the **“Motion”**), with a proposed final order granting the relief requested in the Motion attached thereto as Exhibit B.

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<sup>1</sup> A complete list of the Debtors in these chapter 11 cases may be obtained on the website of the Debtors’ claims and noticing agent at <https://cases.ra.kroll.com/talenenergy>. The Debtors’ primary mailing address is 1780 Hughes Landing Boulevard, Suite 800, The Woodlands, Texas 77380.

**PLEASE TAKE NOTICE THAT**, on May 10, 2022, the Court<sup>2</sup> entered the *Interim Order (I) Authorizing Debtors to (A) Continue Performing Under Prepetition Hedging Agreements, (B) Enter Into and Perform Under New Postpetition Hedging Agreements, and (C) Grant Related Liens and Superpriority Claims and Authorize Posting of Margin Collateral and Postpetition Exchange Collateral, (II) Modifying Automatic Stay, and (III) Granting Related Relief* [Docket No. 116] (the “**Interim Order**”).

**PLEASE TAKE NOTICE THAT**, on June 16, 2022, the Debtors filed the *Debtors’ Reply to Committee’s Omnibus Objection to (I) DIP Motion, (II) Hedging Motion, and (III) Cash Management Motion* [Docket No. 558] (the “**Reply**”), with a proposed order granting the relief requested in the Reply attached thereto as Exhibit A (the “**Revised Proposed Final Order**”).

**PLEASE TAKE FURTHER NOTICE THAT**, the Debtors received comments to the Revised Proposed Final Order from the Official Committee of Unsecured Creditors and certain Hedge Counterparties, which have been addressed in the revised proposed *Final Order (I) Authorizing Debtors to (A) Continue Performing Under Prepetition Hedging Agreements, (B) Enter Into and Perform Under New Postpetition Hedging Agreements, and (C) Grant Related Liens and Superpriority Claims and Authorize Posting of Margin Collateral and Postpetition Exchange Collateral, (II) Modifying Automatic Stay, and (III) Granting Related Relief*, attached hereto as Exhibit A (the “**Further Revised Proposed Final Order**”).

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<sup>2</sup> Capitalized terms used herein but not otherwise defined shall have the meanings ascribed to them as defined in the Motion.

**PLEASE TAKE FURTHER NOTICE THAT**, a redline of the Further Revised Proposed Final Order marked against the Revised Proposed Final Order is attached hereto as **Exhibit B** (the “**Incremental Redline**”).

**PLEASE TAKE FURTHER NOTICE THAT**, a redline of the Further Revised Proposed Final Order marked against the Interim Order is attached hereto as **Exhibit C** (the “**Cumulative Redline**”).

Dated: June 17, 2022  
Houston, Texas

Respectfully submitted,

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and Debtors in Possession*

**Certificate of Service**

I hereby certify that on June 17, 2022, a true and correct copy of the foregoing document was served by the Electronic Case Filing System for the United States Bankruptcy Court for the Southern District of Texas.

/s/ Gabriel A. Morgan

Gabriel A. Morgan